

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

JUL 13 2011

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

vs.

ANDREA STEPTORE aka
NEW ORLEANS

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CRIMINAL NO. H-10-695-SS

SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

**COUNT ONE
(Aggravated Bank Robbery)**

On or about September 9, 2010, in the Southern District of Texas,

ANDREA STEPTORE

defendant herein, along with others known and unknown to the grand jury, did aid and abet each other and did by force, violence, and intimidation, take from the person and presence of another, money belonging to and in the care, custody, control, management, and possession of the Prosperity Bank, located at 2828 F.M. 1960 East, Houston, Texas, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in the process of so doing put in jeopardy the life of persons by the use of a dangerous weapon.

In violation of Title 18, United States Code, Sections 2113(a), 2113(d) and 2.

COUNT TWO
(Brandishing a Firearm During a Crime of Violence)

On or about September 9, 2010, in the Southern District of Texas,

ANDREA STEPTORE

defendant herein, did knowingly use and carry a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit: robbery of a bank, in violation of Title 18, United States Code, Section 2113(a), and in committing the violation, the defendant did brandish said firearm.

In violation of Title 18, United States Code, section 924(c)(1)(A)(ii).

COUNT THREE
(Aggravated Bank Robbery)

On or about September 21, 2010, in the Southern District of Texas,

ANDREA STEPTORE

defendant herein, along with others known and unknown to the grand jury, did aid and abet each other and did by force, violence, and intimidation, attempt to take from the person and presence of another, money belonging to and in the care, custody, control, management, and possession of the Vista Bank Texas, located at 14561 Northwest Freeway, Houston, Texas, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in the process of so doing put in jeopardy the life of persons by the use of a dangerous weapon.

In violation of Title 18, United States Code, Sections 2113(a), 2113(d) and 2.

COUNT FOUR
(Brandishing a Firearm During a Crime of Violence)

On or about September 21, 2010, in the Southern District of Texas,

ANDREA STEPTORE

defendant herein, did knowingly use and carry a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit: robbery of a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a), and in committing the violation, the defendant did brandish said firearm.

In violation of Title 18, United States Code, section 924(c)(1)(A)(ii).

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C), the United States of America gives notice that upon conviction of Aggravated Bank Robbery, as charged in Count One, the United States intends to forfeit all property which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Sections 2113(a) and (d), including, but not limited to: \$24,903.00 in U.S. currency.

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the United States of America hereby gives notice that upon conviction of Possession of a Firearm During a Crime of Violence, as charged in Counts Two and Four, all firearms and ammunition involved in or used in a violation of Possession of a Firearm During a Crime of Violence Title 18, United States Code, Sections 924(c)(1)(A)(ii), 924(c)(1)(A)(iii) are subject to forfeiture.

SUBSTITUTE PROPERTY

In the event that any of the property subject to forfeiture as a result of any act or omission of a defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been placed beyond the jurisdiction of the Court;
- c. has been transferred or sold to, or deposited with a third party;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of such property pursuant to Title 21, United States Code, Section 853(p).

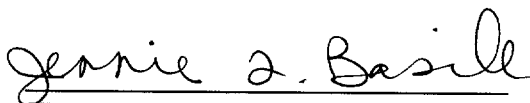
A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

JOSE ANGEL MORENO
United States Attorney

By:


JENNIE L. BASILE
Assistant United States Attorney